

**IN THE UNITED STATES BANKRUPTCY COURT**  
**FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re  
Clara L Bowman

Chapter 13  
Case No 5:20-bk-01002-MJC

COMMUNITY LOAN SERVICING, LLC FKA  
BAYVIEW LOAN SERVICING, LLC  
Movant

v

Clara L Bowman  
Jack N Zaharopoulos  
Respondents

**ANSWER OF DEBTOR TO STAY RELIEF MOTION OF MORTGAGEE**

Clara L Bowman (the "Debtor"), by Debtor's attorney, Robert Spielman, states the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. The Debtor is without sufficient information, despite reasonable investigation, to be able to determine the accuracy of the statements concerning the various assignments of the mortgage, or to determine how Community Loan Servicing LLC came to be in the position of legally enforcing the terms of the mortgage, and proof is therefore demanded. The mortgagee listed on the mortgage is MERS, not JP MorganChase Bank, National Association.
5. Admitted.
6. Admitted. In further answer, the arrearage will be cured within a reasonable amount of time. In further answer, the Debtor has suffered financial harm as a result of the Covid pandemic, appears to be entitled to relief under the CARES Act, and has or will apply for assistance from the Movant.
7. Admitted. In further answer, the arrearage will be cured within a reasonable amount of time. In further answer, the Debtor has suffered financial harm as a result of the Covid pandemic, appears to be entitled to relief under the CARES Act, and has or will apply for assistance from the Movant.

8. Denied. The arrearage will be cured within a reasonable amount of time. Further, the Debtor has suffered financial harm as a result of the Covid pandemic, appears to be entitled to relief under the CARES Act, and has or will apply for assistance from the Movant.
9. Admitted.
10. Admitted.

**WHEREFORE**, the Debtor requests that the Motion be dismissed; and that the Court grant such other relief as is just.

**LAW OFFICES OF ROBERT SPIELMAN, P.C.**

**BY: /s/ Robert Spielman**

Robert Spielman  
PA ID No 21489  
29 East Main Street Ste D  
Bloomsburg, PA 17815-1485  
570-380-1072  
FAX 570-784-3429  
E-mail [bobspielman@yahoo.com](mailto:bobspielman@yahoo.com)  
Website [robertspielman.com](http://robertspielman.com)

Bloomsburg, Pennsylvania  
Dated: February 8, 2022

**CERTIFICATION OF SERVICE**

I, Robert Spielman, 29 East Main Street, Bloomsburg, PA 17815-1485 certify: that I am, and at all times hereinafter mentioned was, more than 18 years of age; and that on the date set forth below, I served a copy of the annexed Answer on:

Jack N Zaharopoulos  
8125 Adams Dr Ste A  
Hummelstown PA 17036

Rebecca A. Solarz, Esquire  
KML Law Group, P.C.  
701 Market Street, Suite 5000  
Philadelphia, PA 19106-1532  
Phone: (215) 627-1322 Fax: (215) 627-7734  
Attorneys for Movant/Applicant

by first class mail, postage prepaid, addressed as set forth above, or by electronic transmission. I certify under penalty of perjury that the foregoing is true and correct.

**LAW OFFICES OF ROBERT SPIELMAN, P.C.**

**BY: /s/ Robert Spielman**  
\_\_\_\_\_  
Robert Spielman  
PA ID No 21489  
29 East Main Street Ste D  
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FAX 570-784-3429  
E-mail [bobspielman@yahoo.com](mailto:bobspielman@yahoo.com)  
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